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15 *Attorneys for Defendant Google LLC*

16   UNITED STATES DISTRICT COURT

17   NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18
                                                     Case No. 5:20-cv-03664-LHK-SVK
19 CHASOM BROWN, WILLIAM BYATT,
    JEREMY DAVIS, CHRISTOPHER   **DECLARATION OF VIOLA TREBICKA**
20 CASTILLO, and MONIQUE TRUJILLO,   **IN SUPPORT OF PLAINTIFFS' MOTION**
    individually and on behalf of all similarly   **TO SEAL PURSUANT TO CIVIL LOCAL**
21 situated,   **RULE 79-5**

22   Plaintiffs,
                                                     Referral: Hon. Susan van Keulen, USMJ
23   v.

24 GOOGLE LLC,

25   Defendant.

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I, Viola Trebicka, declare as follows:

1.   I am a member of the bar of the State of California and a partner with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2.   I am making this declaration pursuant to Civil Local Rule 79-5(e) as an attorney for the "Designating Party," as that term is used in that rule.

3.   On June 23, Plaintiffs filed an administrative motion to file under seal portions of the Motion to Compel Regarding Dispute P3 ("Motion to Compel"), the Proposed Order, the Declaration of John A. Yanchunis, Exhibit 4 thereto, and Exhibits 1-3, 5-8 thereto in their entirety. On the following day, I received a redacted service copy of these documents.

4.   I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5, unredacted copies of which have been filed at Docket Entry 198. Based on my review, there is good cause to seal the following information.

Document	Basis for Sealing
Motion to Compel (Dkt. 198): Redacted Portions in Trebicka Exhibit A at Page 1, lines 16 Page 2, lines 17 Page 3, lines 4, 7, 9-10, 19-24, 28 Page 4, lines 1-3 Page 6, lines 6-11, 28 Page 7, lines 1-2 Page 8, lines 1, 28 Page 9, lines 1	The redacted portions contain Google's confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, the various types of logs maintained by Google, and information contained in those logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such highly confidential information reveals Google's internal strategy, system design, and system capacity regarding various important products, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such highly confidential information could affect Google's competitive standing as competitors may alter their log data/ identifier system designs and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use

	the information to compromise Google's log data preservation and/or internal identifier system. Google respectfully requests that the Court order the redacted portions in the attached version of the Motion to Compel to be filed under seal.
Declaration of John A. Yanchunis In Support Of Plaintiffs' Motion To Compel (Dkt. 198): Redacted Portions in Trebicka Exhibit B at Page 1, lines 8-10, 13-14 Page 2, lines 12-13	The redacted portions contain Google's confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such highly confidential information reveals Google's internal strategy and system design regarding various important products, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such highly confidential information could affect Google's competitive standing as competitors may alter their identifier system designs and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal identifier system. Google respectfully requests that the Court order the redacted portions in the attached version of the Declaration of John A. Yanchunis to be filed under seal.
Exhibit 1 to the Declaration of John A. Yanchunis (Dkt. 198): Trebicka Exhibit C, redacted in its entirety.	These are screenshots of a Google internal service that allows for direct querying of individual cells in a Google internal storage infrastructure, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such highly confidential information reveals Google's internal strategy and system design regarding its data storage system, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such highly confidential information could affect Google's competitive standing as competitors may alter their data storage system designs and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's data

	storage system. Google respectfully requests that the Court order this document to be filed under seal.
Exhibit 2 to the Declaration of John A. Yanchunis (Dkt. 198): Redacted Portions in Trebicka Exhibit D at right-most column of chart.	Exhibit 2 is comprised of Google internal identifiers where raw cookie values were decrypted into. This information is not generally known to the public and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3.
Exhibit 3 to the Declaration of John A. Yanchunis (Dkt. 198): Redacted Portions in Trebicka Exhibit E at Page 2 – 3.	The redacted portions contain Google's confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such highly confidential information reveals Google's internal strategy and system design regarding various important products, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such highly confidential information could affect Google's competitive standing as competitors may alter their identifier system designs and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal identifier system. Google respectfully requests that the Court order the redacted portions in the attached version of the this document to be filed under seal.
Exhibit 4 to the Declaration of John A. Yanchunis (Dkt. 198): Redacted Portions in Trebicka Exhibit F at Page 6, line 1, 17, 22.	The redacted portions contain Google's confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such highly confidential information reveals Google's internal strategy and system design regarding various important products, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such highly confidential information could affect Google's competitive

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	standing as competitors may alter their identifier system designs and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal identifier system. Google respectfully requests that the Court order the redacted portions in the attached version of the this document to be filed under seal.
Exhibit 5 to the Declaration of John A. Yanchunis (Dkt. 198): Trebicka Exhibit G, redacted in its entirety.	This deposition transcript contain Google's confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, the various types of logs maintained by Google, and information contained in those logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such highly confidential information reveals Google's internal strategy, system design, and system capacity regarding various important products, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such highly confidential information could affect Google's competitive standing as competitors may alter their log data/ identifier system designs and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's log data preservation and/or internal identifier system. Google respectfully requests that the Court order this document to be filed under seal.
Exhibit 6 to the Declaration of John A. Yanchunis (Dkt. 198): Trebicka Exhibit H, redacted in its entirety.	This is a Google internal design document concerning the conversion of different internal cookies. It contains Google's confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such highly confidential information reveals Google's internal strategy and system design regarding various important products, and

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1 2 3 4 5 6 7		falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such highly confidential information could affect Google's competitive standing as competitors may alter their identifier system designs and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal identifier system. Google respectfully requests that the Court order this document to be filed under seal.
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Exhibit 7 to the Declaration of John A. Yanchunis (Dkt. 198): Redacted Portions in Trebicka Exhibit I at Pages 1, 2, 3.	The redacted portions contain Google's confidential technical information regarding the operation of Google's products and systems, including the various types of Google's internal identifiers/cookies and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such highly confidential information reveals Google's internal strategy, system design, and system capacity regarding various important products, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such highly confidential information could affect Google's competitive standing as competitors may alter their log data/ identifier system designs and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal identifier system. Google respectfully requests that the Court order the redacted portions in the attached version of the this document to be filed under seal.
23 24 25 26 27 28	Exhibit 8 to the Declaration of John A. Yanchunis (Dkt. 198): Trebicka Exhibit J, redacted in its entirety.	This is a list of relevant Google internal logs and retention periods for each log. It contains Google's confidential technical information regarding the operation of Google's products and systems, including the various types of logs maintained by Google and retention periods applicable thereto, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such highly confidential information reveals Google's internal strategy,

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	system design, and system capacity regarding various important products, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such highly confidential information could affect Google's competitive standing as competitors may alter their log data system designs and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's log data preservation and system. Google respectfully requests that the Court order this document to be filed under seal.
Proposed Order (Dkt. 198): Redacted Portions in Trebicka Exhibit K at Page 1, lines 18-19.	The redacted portions contain Google's confidential technical information regarding highly sensitive features of Google's operations and consumer data, including the various types of Google's internal identifiers/cookies. Google respectfully requests that the Court order the redacted portions in the attached version of the this document to be filed under seal.

5.   Google's request is narrowly tailored in order to protect its confidential information. These redactions are limited in scope and volume. Because the proposed redactions are narrowly tailored and limited to portions containing Google's highly-confidential or confidential information, Google requests that the portions of the aforementioned documents be redacted from any public version of those documents.

6.   Google does not seek to redact or file under seal any of the remaining portions of Plaintiffs' Motion to Compel and accompanying declarations and exhibits not indicated in the table above.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in Los Angeles, California on June 28, 2021.

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DECLARATION OF VIOLA TREBICKA

1   DATED: June 28, 2021   QUINN EMANUEL URQUHART &
                                                   SULLIVAN, LLP

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4   By _____

                                              Viola Trebicka

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6   *Attorney for Defendant*

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